

Outline of the Phase II Report

The Executive Summary, which appears before Chapter 1, highlights the types of research performed in Phase II and describes important findings, implications, and conclusions of the research, as well as the EPA recommendations developed through the project.

Chapter 1, *Overview of Phase II of CLI*, describes the overall process, structure, activities, findings, and recommendations of Phase II of the CLI.

During Phase II, CLI participants funded and directed quantitative and qualitative research to assess consumers' comprehension, attitudes, behavior, and satisfaction with labeling; to evaluate alternatives; and to recommend comprehensive, specific improvements to labels, as well as regulatory or policy changes that would enable these improvements. Chapters 2, 3, and 4 discuss in detail the quantitative and qualitative research process, findings, and conclusions.

The quantitative segment of this research (Chapter 2) involved a detailed and comprehensive national telephone and mail survey. Chapter 2 describes the goals, methodology, process, and results of this quantitative research. The results are discussed in two categories: findings and implications. Findings result directly from the quantitative survey results and are supported by the data. Implications, however, are derived from the findings and are included to identify connections between separate but related findings.

The qualitative research done in Phase I formed the basis of the quantitative research, which in turn provided a necessary foundation for continuing qualitative research in Phase II. The CLI's quantitative research team identified a number of areas in which a more in-depth interview technique could be used to advantage, particularly exploring consumers' preferences regarding possible language and format options for standardized product labels. Qualitative focus groups were designed and run with 27 groups of consumers in different parts of the United States. This research is described in Chapter 3.

The findings and implications reported in Chapters 2 and 3 are very extensive and closely connected conceptually. To help readers assimilate these research data and understand the directions in which they point, a separate chapter (Chapter 4) outlines the conclusions of both the quantitative and qualitative research. Conclusions, as used in this report, are defined as broad statements — arising from the research findings and implications — about product labels and consumers' comprehension, satisfaction, and preferences.

The next four chapters focus on other related work done during Phase II. Chapter 5 discusses qualitative research that was performed to update and improve First Aid statements on consumer product labels for indoor insecticides, outdoor pesticides, and household hard surface cleaners. The research involved in-depth one-on-one interviews with consumers to identify problematic language and potential alternative wording.

The CLI is a collaboration among many different stakeholders, who explored many issues related to product labeling for household insecticides, pesticides, and hard surface cleaners. Chapter 6 describes the different subgroups that contributed to Phase II, the specific activities undertaken by the subgroups, the process followed by each subgroup, and the findings that the subgroups generated. Specifically, this chapter describes the work of (a) the Standardized Environmental

Information Subgroup, (b) the Storage and Disposal Subgroup, and (c) the Consumer Education Subgroup.

One of the most important elements of the CLI has been the coming together of some of its most committed participants and stakeholders, including CLI Partners and the CLI Task Force. The Task Force consists of federal, state, and other regulatory entities with expertise and interest on labeling issues. The Partners are a larger group of voluntary participants who have expressed interest in these labeling issues and have made a long-term commitment to participate actively in the work of the CLI. Several large Partner and Task Force meetings were held during the course of Phase II. Chapter 7 discusses the information that was presented at each of these meetings.

Throughout its history, the CLI has encouraged the input and participation of all interested individuals and groups, regardless of their level of involvement. Stakeholders provided particularly valuable input in identifying possible deficiencies in current labels and in suggesting options for changes to EPA programs not directly related to product labels. Stakeholders have included consumer product manufacturers, retailers, marketers, trade associations, environmental labeling program practitioners, government (federal, state, and local) agencies (including non-U.S. government agencies), academics, public interest groups, consumer groups, environmental groups, health and safety professionals, standards-setting organizations, media groups, and individual citizens. Chapter 8 describes both the outreach efforts made by the CLI to obtain comments from all interested stakeholders, and the Stakeholder responses submitted in the course of Phase II. Chapter 8 focuses specifically on the participation of stakeholders other than Partners and Task Force members.

Finally, Chapter 9 lists the recommendations for action that came out of Phase II. The Partners and Task Force members together drafted and approved recommendations regarding Signal Words and Hazard Hierarchy, Ingredients, Label Formats, Consumer Education, and Storage and Disposal. The CLI carefully considered all the Phase II research findings, implications, and conclusions discussed in Chapters 2 through 4, as well as the supplementary research described in Chapters 5 through 8, in coming up with its recommendations. The final list of recommendations was submitted to EPA senior management for consideration, and during the April 7-8th, 1999 Partner and Task Force meeting, EPA announced which recommendations could be implemented immediately, and which still needed approval from EPA senior management. (See Chapter 9 for details.)